

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GIDEON RAPAPORT,

Plaintiff,

- against -

RICHARD ALLEN EPSTEIN, MITCHELL :  
KEVALLA PALLAKI, AJAY :  
SRINIVASAN IYER, ZACHARY :  
GEORGE GARRETT, WILLIAM STUART :  
LASSETER WEINBERG, ANDREW :  
NELMS, JOHN DOES 1-3, :

Defendants.

No. 24-cv-07439-JGLC

**NOTICE OF MOTION TO SET  
ASIDE DEFAULT AND EXTEND  
TIME TO RESPOND**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and proposed order annexed thereto, and all pleadings herein, Defendant Professor Richard Epstein hereby moves before the Honorable Jessica G. L. Clarke, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 11B, New York, New York, for an order (1) setting aside the entry of default of Defendant noted by the Clerk at ECF No. 32, pursuant to Federal Rule of Civil Procedure 55(c); (2) denying as moot Plaintiff's request for expedited discovery against Defendant Professor Epstein at ECF No. 35; and (3) extending Defendant Professor Epstein's time to answer, move against, or otherwise respond to Plaintiff's Complaint to March 14, 2025, pursuant to Federal Rule of Civil Procedure 6(b).

Dated: February 4, 2025

Respectfully submitted,

/s/ Jeremy Chase

Jeremy Chase

Nimra H. Azmi

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